

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Karen Anne Green d/b/a/ Ks Chaises LLC aka Speedy Furniture of Carnegie
Kenneth Rogulski d/b/a RT Furniture LLC aka Speedy Furniture Irwin
d/b/a RT Furniture LLC aka Speedy Furniture of Latrobe**

Debtors

**PNC Bank, National Association, its successors
and/or assignees**

Movant

vs.

**Karen Anne Green d/b/a/ Ks Chaises LLC aka Speedy Furniture of Carnegie
Kenneth Rogulski d/b/a RT Furniture LLC aka Speedy Furniture Irwin
d/b/a RT Furniture LLC aka Speedy Furniture of Latrobe**

Ronda J. Winnecour, Trustee

Respondents

BK NO. 23-20810 JAD

Chapter 13

Related to Document No. 33

Hearing Date: 6/5/2023

**OBJECTION OF PNC BANK, NATIONAL ASSOCIATION, ITS SUCCESSORS
AND/OR ASSIGNEES TO CONFIRMATION OF CHAPTER 13 PLAN**

PNC Bank, National Association objects to confirmation of Debtors' Chapter 13 Plan and asserts in support of its Objection as follows:

1. Movant's claim is secured by a mortgage on Debtors' property at 114 Royalbrooke aka 114 Royalbrooke Dr, Venetia, PA 15367
2. The claims bar date is June 23, 2023. Secured Creditor intends to file a claim on or before the bar date with the total debt estimated at \$13,406.24.
3. Debtors' Plan provides for payment in the amount of \$0.00 towards the total debt claim of the Movant.
4. Debtors' Plan understates the amount of the Movant's claim by \$13,406.24 and does not provide sufficient funding to pay said claim including present value interest.
5. Accordingly, Debtors' Plan is not feasible, as it does not fully compensate the Movant.

6. In addition, the Debtors' Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Movant, PNC Bank, National Association, prays that the Court deny confirmation of the Debtors' Plan.

Respectfully submitted,

Date: May 26, 2023

/s/ **Brian C. Nicholas, Esquire**

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